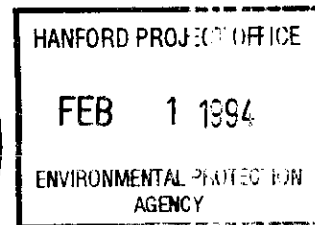
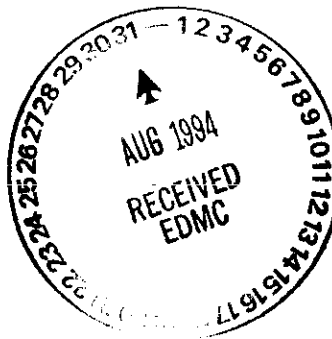


3220 South Everett Place
Kennewick, Washington 99337
30 Jan 94



Ms. Pam Innis, U.S. Environmental Protection Agency

Mr. Brian Foley, U.S. Department of Energy

Mr. Norm Hepner, Washington State Department of Ecology

Subject: Proposed Environmental Restoration Disposal Facility

Dear Governmental Representatives:

I had occasion to attend the public hearing of 25 Jan 94 in regard to the subject disposal facility to be constructed on the Hanford Site. There are several items of considerable concern to me with both the proposed plan as well as certain statements in the public notice announcement. I sincerely believe you need to address each of the items I present below to better assure the public the proposed burial trench, does indeed, serve to permanently dispose of radioactive and hazardous (mixed) waste, while at the same time, protect the environment/public from unnecessary exposure to the buried materials.

I have elected to simply present my concerns as a list rather than go into a dissertation style presentation. I hope this will be easier for you in your evaluation of the public's concerns in this matter. Following are my concerns and/or comments.

1. I find it unconscionable that you are considering placing mixed waste into this landfill with out substantial (metal) containers. I must remind you that immediately next to the ERDF, at the U.S. Ecology Site, they are required to have all materials in containers. You would do well to consult the licensing requirements imposed on U.S. Ecology by the U.S. Nuclear Regulatory Commission and the Washington State Department of Health and plan your actions at least as stringent. As the old saying goes, "What is good for the goose is good for the gander".

2. Why is there no mention of "treatment" for any of the waste to be placed in this trench? I firmly believe you should be considering soil washing, hydrocarbon distillation, acid/base neutralization, TCE removal as you did at the Plutonium Finishing Plant, to mention but a few options.

3. I fully realize a 55 gallon drum that has been filled with contaminated earth would not be compressible but there will surely be a considerable quantity of other materials that would be compressible. It follows that with your present expectations of 30 million cubic yards to be contained at the end of the Hanford cleanup, if just 25% of this volume were to be compacted to 25% of its uncompacted volume, the size of your trench would be reduced from 6.12 square miles to 4.97 square miles. The fact that you would not have to dig up 1.15 square miles would no doubt be a significant cost reduction and would more than pay for several huge compactors.

4. Under no circumstances should this trench be constructed without at least two impervious liners and a leachate collection system. I refer you to the requirements imposed on New Waste, Inc. (Pasco Landfill) and the restrictions they must observe in the landfilling of nothing more than household wastes. I suggest you investigate their license as administered by the Washington State Department of Health.

5. It was stated during the hearing that each of the 78 operable units covering the 1,100 waste sites would be administered by an individual manager. This manager would in turn make the various decisions regarding what would happen with the particular waste. If the ERDF were being planned by a group of congressmen or representatives, this action would be called "pork barreling". Why is it one group, that probably already exists, cannot be responsible for the administration of the trench and base their decisions on analytical analysis of the material to be buried and take action accordingly. There is absolutely no need to establish 78 new organizations at Hanford.

6. Assuming you do install impervious liners and the leachate collection system, what do you propose on doing with the leachate that will eventually be collected. The disposal of this liquid could well pose a very serious problem to the operation of the trench.

7. I question how you will be able to build a railroad to the site and disturb the old growth sagebrush that is currently being protected. I understand that a new highway to alleviate the horrendous traffic problem to the 200 areas is out of the question due to the sagebrush, and construction of rail lines to the ERDF would certainly have some adverse affect on this vegetation.

8. The proposal to simply dump contaminated materials from a rail car or tractor trailer is beyond my imagination. How do you propose to control the wind-blown dust during loading of the transport vehicle, movement to the site, and dumping into the excavation prior to its being covered with clean soil. This is one aspect of your plan that will present an insurmountable problem. If you proceed with the dumping of loose soils, you are going to contaminate all of southeastern Washington.

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Please do not think I am opposed to the construction of the ERDF. Rather, I fully support the plan to dispose of Hanford waste at Hanford but only with what we believe today to be the most environmentally sound methods. I further believe all work with the ERDF must follow established guidelines as applicable to our neighbors with no shortcuts to simply satisfy Tri-Party Agreement milestones. Likewise, I hope the burial in the ERDF will be of a permanent nature.

In closing, I say "lets do it once, do it right and not have to do it again".

Sincerely,

John J. Wick, Jr.

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